STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

September 21, 2005

Certified Mail No. 7005 0390 0003 2967 8083

Mr. John Ihli
Operations Manager
Seminis Vegetable Seeds
1811 E. Florida
Nampa, ID 83686

RE: Facility ID No. 027-00072, Seminis Vegetable Seeds, Nampa
Final Permit to Construct

Dear Mr. Ihli:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-040023 to Seminis Vegetable Seeds located in Nampa. This permit is issued in accordance with IDAPA 58.01.01.200 through 228, Rules for the Control of Air Pollution in Idaho, and is effective immediately.

This permit does not release Seminis Vegetable Seeds from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of DEQ's Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

for:

Martin Bauer, Administrator
Air Quality Division

MB/HE/sd
Enclosures

Permit No. P-040023

Air Quality
PERMIT TO CONSTRUCT

State of Idaho
Department of Environmental Quality

PERMIT No.: P-040023
FACILITY ID No.: 027-00072
AQCR: 064 **CLASS:** B
SIC: 0723 **ZONE:** 11
UTM COORDINATE (km): 536.5, 4822.5

1. **PERMITTEE** Seminis Vegetable Seeds			
2. **PROJECT** Initial Permit to Construct			
3. **MAILING ADDRESS** 1811 E. Florida Avenue	**CITY** Nampa	**STATE** Idaho	**ZIP** 83686
4. **FACILITY CONTACT** John Ihli	**TITLE** Operations Manager	**TELEPHONE** (208) 468-4517	
5. **RESPONSIBLE OFFICIAL** John Ihli	**TITLE** Operations Manager	**TELEPHONE** (208) 468-4517	
6. **EXACT PLANT LOCATION** 1811 E. Florida Avenue, Nampa, Idaho 83686		**COUNTY** Canyon	
7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS** Beans, Seeds, and Corn Processing, Treatment, and Packaging Facility			

8. **GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho,* IDAPA 58.01.01.200, et seq.

TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: **September 21, 2005**

Table of Contents

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedure Act
MMBtu	million British thermal units
NO_x	Oxides of nitrogen
O&M	operations and maintenance
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
Seminis	Seminis Vegetable Seeds
SIC	Standard Industrial Classification
SO_2	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 The purpose of this permit to construct (PTC) is to satisfy the requirements of IDAPA 58.01.01.200 et seq., *Rules for the Control of Air Pollution in Idaho.*

1.2 This permit is the facility's initial PTC.

Regulated Sources

Table 1.1 lists all sources of emissions that are regulated in this PTC.

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Sections	Source Description	Emissions Control(s)
2	Seed Processing Operations Seminis Vegetable Seeds is an existing facility that incorporates processes and handling equipment to receive, clean, treat, and package bean, pea, corn, and onion seeds for transport off-site. Processes at the facility are: 1. Seed and corn receiving. The PM_{10} emissions are controlled by baghouse #1. 2. Conditioning line 1. The PM_{10} emissions are controlled by baghouse #2. 3. Conditioning line 2. The PM_{10} emissions are controlled by baghouse #3. 4. Electric sorting line. The PM_{10} emissions are controlled by baghouse #4 and baghouse #9. 5. Seed treatment and packaging Line 1. The PM_{10} emissions are controlled by baghouse #6. 6. Seed treatment and packaging Line 2. The PM_{10} emissions are controlled by baghouse #5. 7. Corn sheller line. The PM_{10} emissions are controlled by baghouse #7. 8. Mini-pack line. The PM_{10} emissions are controlled by baghouse #8.	Particulate emissions from the seed processing at the facility are controlled by Baghouses that have the following specifications: Baghouse #1 Manufacturer: Torit/Donaldson Model No: 4DF32 Serial No.: 193067 PM_{10} removal efficiency: 99.99% Type filter: Ultra-web cartridges Air-to-cloth ratio: 1.5:1 Baghouse #2 Manufacturer: Alanco Environmental Model No: 312RLP-10 PM_{10} removal efficiency: 99.9% Baghouse #3 Manufacturer: Alanco Environmental Model No: 188RLP-10 PM_{10} removal efficiency: 99.9% Baghouse #4 Manufacturer: Torit Model No: 84; Serial No.: C-1647 PM_{10} removal efficiency: 99.9% Baghouse #5 Manufacturer: U.S. Air Filtration, Inc. Model No.: not available PM_{10} removal efficiency: 99.9% Baghouse #6 Manufacturer: Alanco Environmental Model No.: Not available PM_{10} removal efficiency: 99.9% Baghouse #7 Manufacturer: U.S. Air Filtration, Inc. Model No.: Not available PM_{10} removal efficiency: 99.9% Baghouse #8 Manufacturer: Mac Model No.: 39AVSC25 Serial No.:94VSF05-016 PM_{10} removal efficiency: 95% Baghouse #9 Manufacturer: Air Sentry Model No: 180 SB; Serial No.: 079404 PM_{10} removal efficiency: 95% Model No: 40455 E86 PM_{10} removal efficiency: 99.9%
3	Corn and Seed Drying Corn and seed drying is achieved by using nine identical drying lines (tunnel A through tunnel I) composed of nine Maxon natural burner units. The total maximum hourly combustion rate for the nine dryers is 47 million British thermal units (MMBtu).	No emissions control

2. SEED (BEAN, PEA, CORN, AND ONION) PROCESSING OPERATION

2.1 Process Description

Bean, pea, and onion seed processing operation begins with raw seeds shipped to the facility via flat or hopper bottom trucks. The seeds are transferred from the trucks onto a receiving conveyor in the receiving building. The conveyor system transfers the seeds into a series of steel bins. The incoming product is weighed and analyzed for moisture content and product quality. Seeds are then transferred with mobile forklifts to the seed cleaning and sorting line building. Once cleaning and sorting is completed, the seeds are transferred to the seed storage building until customers request product orders. Upon customer requests, the seeds are transferred to the seed treatment and packaging building. Seeds are coated with appropriate herbicide and pesticide in a drum mixer according to customer requests or growing conditions. After seed coating is completed, seeds are packaged, placed on pallets, and prepared for shipment.

Corn is also processed at the facility. Corn is received on the cob. The corn is husked and dried, and then the kernels are removed from the cob and incorporated into the cleaning and treatment process. The product is packaged after processing and stored prior to shipment off-site.

Emissions of criteria air pollutants, TAPs, and HAPs are generated and released to the atmosphere from the seed processing operations.

Fugitive emissions also occur from truck unloading of seeds and from trucks driving on paved and unpaved roads. Process particulate fugitives emissions include corn receiving process, corn drying process, and facility-wide process emissions not captured by the baghouses.

2.2 Emissions Control Description

The PM_{10} emissions from the seed processing operations are controlled by baghouses (#1 through #9). The PM_{10} control efficiencies of the baghouses are included in Table 1.1.

Emissions Limits

2.3 Visible Emissions Limit

The permittee shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.4 PM_{10} Emissions Limits

Particulate matter with an aerodynamic diameter less than or equal to nominal 10 micrometers (PM_{10}) emissions from the seed processing baghouse stacks, inclusive, shall not exceed any corresponding emissions rate limits listed in Table 2.4.

Table 2.4 EMISSIONS LIMITS FROM THE BAGHOUSE STACKS

Source Description	PM_{10}	
	lb/hr[a]	T/yr[b]
Seed processing operation stacks	0.05	0.03

[a] pounds per hour
[b] tons per any consecutive 12-month period

Operating Requirements

2.5 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.6 Seed Throughput Limits

The permittee shall process no more than 17,844 tons of seed per any consecutive 12-month period.

2.7 Baghouse Monitoring Equipment

The permittee shall, in accordance with manufacturer specifications, install, calibrate, maintain, and operate equipment to continuously measure the pressure differential across each seed processing baghouse.

2.8 Operations and Maintenance Manual

Within 60 days of permit issuance, the permittee shall have developed an operations and maintenance (O&M) manual for each seed processing baghouse. The manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for each baghouse. The manual shall contain, at a minimum, the pressure drop operating range for each baghouse and scheduled maintenance requirements. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request. Within 30 days of O&M manual development, the permittee shall submit a copy of the manual to DEQ for review and comment.

2.9 Pressure Drop Across the Baghouses

The pressure drop across each seed processing baghouse shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.10 Maintenance and Operation of the Baghouses

The permittee shall maintain and operate the seed processing baghouses according to manufacturer and O&M manual specifications and recommendations to demonstrate compliance with Permit Conditions 2.3 and 2.4 and General Provision 4.2.

2.11 Baghouse Operations

The seed processing baghouses shall be operated whenever the respective seed process operates.

Monitoring and Recordkeeping Requirements

2.12 Operating Parameters

The following parameters shall be monitored and recorded. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

- Pressure drop across each of the baghouses, once daily when the respective seed processes operate.
- Seed throughput in tons per month and tons per any consecutive 12-month period. Annual throughput shall be determined by summing monthly throughput over the previous consecutive 12-month period.

2.13 Reasonable Control Measures

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.14 Visible Emissions Monitoring

The permittee shall conduct a monthly inspection of visible emissions from the seed processing baghouse stacks during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from the baghouse stacks, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

3. CORN AND SEED DRYING

3.1 Process Description

Corn and seed drying is conducted by using nine identical drying lines composed of nine Maxon natural burner units. During the summer months, natural gas burners are not used to heat the air. Hot ambient air is simply pulled through the tunnels and is sufficient to dry the product. When in use, each drying line uses centrifugal fans to pull large volumes of air across a gas burner, which heats the air. Hot air is pushed through underground tunnels (A through I), which are equipped with horizontal vent slots at ground level. The vent slots are configured to accept metal bins containing seeds for drying. Bins can be stacked up to four bins high.

All corn is dried prior to further processing and a small amount of beans and seeds require drying to reduce moisture content. All incoming product is transferred to the drying lines via forklift and stacked on the dryer vent slots to allow for drying of multiple bins at once

No stacks or emission control equipment are associated with the drying lines.

3.2 Emissions Control Description

The PM_{10} process emissions and the combustion gases (i.e., CO, NO_x, SO_2, and VOC) emissions from the Maxon dryers are uncontrolled.

Emissions Limits

3.3 Fuel-Burning Equipment

The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, in accordance with IDAPA 58.01.01.677.

Operating Requirements

3.4 Natural Gas Combustion Limit

The maximum amount of natural gas combusted in the nine Maxon dryers shall not exceed 514 million standard cubic feet per any consecutive 12-month period (MM ft^3/yr).

Monitoring and Recordkeeping Requirements

3.5 Natural Gas Fuel Combustion

The permittee shall monitor and record monthly and annually the total amount, expressed in units of million cubic feet, of natural gas combusted in the nine Maxon dryers to demonstrate compliance with Permit Condition 3.4. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

3. The permittee shall allow the director, and/or the authorized representative(s), upon the presentation of credentials:

   - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
   - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the director.

4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.

5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:

   - Initiation of Construction - Date
   - Completion/Cessation of Construction - Date
   - Actual Production Startup - Date
   - Initial Date of Achieving Maximum Production Rate - Production Rate and Date

6. The director may require the permittee to develop a list of operation and maintenance procedures to be submitted to DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.

7. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

8. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

9. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.